

Law Office of G. Anthony Long
P. O. Box 504970, Beach Road
San Jose, Saipan, MP 96950
Telephone No. (670) 235-4802
Facsimile No. (670) 235-4801

Attorney for Defendant Dong Guk

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

JUNG SOON LEE, (Deceased))	CIVIL ACTION 05-0031
By SUNG YOUNG LEE, Personal)	
Representative)	
Plaintiff)	
)	DEFENDANT'S INTERROGATORIES TO
v.)	PLAINTIFF
DONG GUK CORPORATION)	
)	
Defendant)	
_____)	

TO: PLAINTIFF AND HIS ATTORNEYS OF RECORD:

These interrogatories are served upon you by defendant pursuant to Rule 33 of the Federal Rules of Civil Procedure. The responses to this request, which are due within thirty (30) days of service upon you, shall be delivered to the Law Office of G. Anthony Long, P. O. Box 504970, Beach Road, San Jose, Saipan, MP 96950.

A. INSTRUCTIONS FOR USE

1. In these interrogatories:
 - (a) The words "you" and "your" means Sung Young Lee, personal representative for Jung

Soon Lee, (deceased), which includes the heirs of Sung Young Lee, (deceased).

- (b) The term "Jung Soon Lee" means Jung Soon Lee, (deceased).
- (c) The term "Accident " means the motor vehicle accident which occurred on or about August 2, 2004 as alleged in your complaint, which includes the death of Jung Soon Lee, (deceased).
- (d) The word "person(s)" means all entitles and, without limiting the generality of the foregoing, includes natural persons, joint owners, associations, companies, partnerships, joint ventures, corporations, governmental entities, trusts and estates.
- (e) The word "document(s)" means all written, printed, recorded, and graphic matter, photographic matter or sound reproductions, however produced or reproduced, which includes e-mail and other electronic documents .
- (f) The words "identify," "identity," or "identification," when used with respect to a person or persons, require a statement of the full name and present or last known residence and business address of such person or persons and, if a natural person, his present or last known job title, and the name and address of his present or last known employer.
- (g) The words "identify," "identity," or "identification," when used with respect to a document or documents requires a description of the document by date, subject matter, name(s) of person(s) who wrote, signed, initialized, dictated or otherwise participated in the creation of same, the name(s) of the addressee or addressees (if any) and the name(s) and address(es) of each person or persons having possession, custody or control of such document or documents. If any such document was, but is no longer, in your possession, custody or control, or in existence, state the date and manner of its disposition.

- (h) The word "identify," when used with respect to an act (including an alleged offense), occurrence, statement or conduct (hereinafter collectively called "act"), means (1) to describe the substance of the event or events constituting such acts, and state the date when such act occurred; (2) To identify each and every person or persons participating in such act; (3) to identify all other persons (if any) present when such act occurred; (4) to state whether any minutes, notes, memorandum or other record of such act was made; (5) to state whether such record now exists; (6) to identify the person or persons presently having possession, custody or control of each such record.
2. If you refuse to answer any interrogatory by reason of a claim of privilege, then in the case of each such document, identify the specific privilege and state the circumstances relied upon to support the claim of privilege.

INTERROGATORY NO. 1

State the name, current address and current telephone number of each person, other than Jung Soon Lee, that was in the motor vehicle driven by Gyu Jin Kim at the time of the accident.

INTERROGATORY NO. 2

State exactly where each individual, including Jung Soon Lee was sitting in the motor vehicle driven by Gyu Jin Kim at the time of the accident.

INTERROGATORY NO. 3

Fully and comprehensively describe the type of alcoholic beverages and number of each type of alcoholic beverage that Gyu Jin Kim consumed during the ten hour period immediately prior to the accident and the location and time at the location where Gyu Jin Kim consumed such alcoholic beverages.

INTERROGATORY NO. 4

Fully and comprehensively describe the type of alcoholic beverages and number of each type of alcoholic beverage that Jung Soon Lee consumed during the ten hour period immediately prior to the accident and the location and time at each location where Jung Soon Lee consumed such alcoholic beverages.

INTERROGATORY NO. 5

For each person identified in response to Interrogatory number 1, fully and comprehensively describe the type of alcoholic beverages and number of each type of alcoholic beverage that the person had consumed during the ten hour period immediately prior to the accident and each location where the person consumed the alcoholic beverage.

INTERROGATORY NO. 6

State the name, current address, current telephone number and current email address of each person whom you contend consumed alcohol at defendant's establishment after 2:00 a.m. on or about August 2, 2004.

INTERROGATORY NO. 7

Fully and comprehensively state how the accident occurred.

INTERROGATORY NO. 8

Fully and comprehensively state each duty owed to Jung Soon Lee which you contend was breached by defendant and the facts which support each contention.

INTERROGATORY NO. 9

For each fact identified in your response to Interrogatory No. 8, please state the name, current address, current telephone number and current email address for each person known to you who possesses discoverable knowledge of the fact and the knowledge possessed by the person.

INTERROGATORY NO. 10

For each fact identified in your response to Interrogatory No. 8, please identify each document known to you which supports the fact.

INTERROGATORY NO. 11

Fully and comprehensively identify the economic damages, you content they have been suffered as a result of the accident and the monetary value placed on such economic damages.

INTERROGATORY NO. 12

Fully and comprehensively state the factors relied on in calculating the economic damages and how you calculated the economic damages.

INTERROGATORY NO. 13

For each economic damage identified in your response to Interrogatory No. 11, please state the name, current address, current telephone number and current email address of each person known to you who possesses discoverable knowledge of the economic damage and the knowledge possessed by each such person.

INTERROGATORY NO. 14

For each economic damage identified in your response to Interrogatory No. 11, please identify each document known to you which supports the claimed economic damage.

INTERROGATORY NO. 15

Fully and comprehensively identify the non- economic damages you content have suffered as a result of the accident and the monetary value placed on such economic damages.

INTERROGATORY NO. 16

Fully and comprehensively state the factors relied on in calculating the non-economic damages and how you calculated the non economic damages.

INTERROGATORY NO. 17

For each non-economic damage identified in your response to Interrogatory No. 15, please state the name, current address, current telephone number and current email address of each person known to you who possesses discoverable knowledge of the non-economic damage and the knowledge possessed by each such person.

INTERROGATORY NO. 18

For each non-economic damage identified in your response to Interrogatory No. 15, please identify each document known to you which supports the claimed economic damage.

INTERROGATORY NO. 19.

State the date, time and cause of Jung Soon Lee's death.

INTERROGATORY NO. 20

State the name, date of birth, nature of relationship, current address, current telephone number and current email address of each heir of Jung Soon Lee.

INTERROGATORY NO. 21

State the amount of each and every settlement or compensation of any kind received by you as a

result of Jung Soon Lee's death and the name, current address, current telephone number and current email address of the person making each such settlement or compensation payment.

INTERROGATORY NO. 22

State the time you contend Jung Soon Lee and Gyu Jin Kim departed defendant's business on the night or morning of the accident and fully and comprehensively explain why Jung Soon Lee got in the vehicle being driven by Gyu Jin Kim instead of calling a taxi or arranging for some other transportation.

INTERROGATORY NO. 23.

State Jung Soon Lee's blood alcohol content at the time of her death.

Sung Young Lee
Personal Representative of Jung Soon Lee, (deceased).

ACKNOWLEDGMENT

The foregoing answers to interrogatories were duly acknowledged before me this ____ day of September, 2006 by Sung Young Lee, in his capacity as personal representative of Jung Soon Lee, known to me or proven to me to be the same person who executed the foregoing document.

In witness whereof, I have hereunto set my hand and affixed my official seal on the date and year first-above written.

Notary Public